

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT  
OF NEW YORK

IN THE MATTER OF HYLAND,

Et al.

Plaintiff,

v.

Navient Corp., et al.,

Defendant.

Case No.: 18 Civ. 9031

OBJECTION TO PROPOSED SETTLEMENT

I, Joelle Dominique Millikin, since October 1<sup>st</sup>, 2007:

- (i) Have or had FFEL or Direct Loans serviced by Navient;
- (ii) Are or were employed full-time by a qualifying public service employer or employers for purposes of PSLF; and
- (iii) Spoke/communicated with a Navient customer service representative about subjects relating to eligibility for PSLF;

and I am, therefore, a class member.

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**JOELLE DOMINIQUE MILLIKIN**

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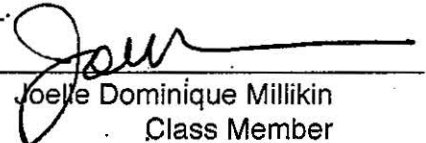
Email: forrest.millikin@icloud.com

1 I have reviewed the proposed settlement between Hyland, et al. and Navient Corp., et  
2 al., and I disagree with the terms for many material reasons, including:

- 3 (i) My PSLF eligible loans are no longer serviced by Navient, and thus requiring  
4 Navient to "design, implement, and maintain specific, substantial procedures  
5 to enhance its PSLF-related practices" would provide no relief to me, if my  
6 rights and interests were harmed by Navient's misleading behavior in the  
7 past. The "toothpaste is already out of the tube," and these procedures would  
8 in no way rectify the harm they may have committed to me previously;
- 9 (ii) Defendants creating a "non-profit organization formed to provide education  
10 and student loan counseling to public service borrowers" would also provide  
11 no benefit and no relief to me if my interests and rights were harmed by  
12 Navient previously. Once you no longer have eligible loans for PSLF, you  
13 cannot later convert them into PSLF eligible loans. No longer misleading or  
14 misinforming customers in the future provides no relief to customers in the  
15 past.
- 16 (iii) I am not a class representative, so I would not receive any financial  
17 compensation, whether or not Navient significantly harmed my financial  
18 interests or rights to receive relief through the PSLF program.

19  
20 WHEREFORE, I OBJECT to the proposed settlement and I do not want to be included  
21 in the agreement.

22  
23 Dated this 22 day of July, 2020.

24   
25 Joelle Dominique Millikin  
26 Class Member  
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